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August 13, 2024

VIA ECF

Hon. André M. Espinosa, U.S.M.J.
U.S. District Court of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

**Re: Airtech International Inc. v. Yim, et al.
Case 2:22-cv-668-JXN-AME**

Dear Magistrate Espinosa:

We write jointly with counsel for Plaintiff with respect to Your Honor's August 2, 2024 Order, which requires the parties to file a joint status letter by August 15, 2024 identifying any outstanding discovery issues and proposing an expedited schedule for the completion of all remaining discovery.

Please note that on July 31, 2024, Defendants produced responsive emails from Defendant Byungchan Yim's Gmails, which were extracted by a third-party vendor. That production including thousands of additional pages of documents. During the recent August 2, 2024 case management conference, the parties noted that because of the volume of this production, the August 15, 2024 deadline may need to be extended should Plaintiff require additional time to review this production.

The parties have met and conferred on these items and respectfully request Your Honor's approval to extend the August 15, 2024 deadline for the joint status letter by ten (10) days to August 26, 2024. The parties intend to exchange proposed discovery schedules next week, while Plaintiff completes their review of Defendants' production.

Thank you in advance for the Court's continued assistance and cooperation.

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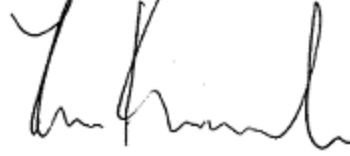
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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Thomas Kamvosoulis', written in a cursive style.

Thomas Kamvosoulis

cc: All Counsel of Record